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July 23, 2024

**BY ECF**

The Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Tsani Russell,*  
19 Cr. 554 (NRB)

Dear Judge Buchwald:

This letter is submitted on behalf of defendant Tsani Russell, whom I represent in the above-entitled case, and, for the reasons set forth below, respectfully requests that the hearing on his Violation of Supervised Release (“VOSR”), currently scheduled for next Tuesday, July 30, 2024, at 11:30 a.m., be adjourned until shortly after September 9, 2024. I have been in contact with Assistant United States Attorney Jeffrey C. Coffman, and he has informed me the government does not object to this application.

Mr. Russell’s New York State criminal case – the underlying basis for the VOSR – has been adjourned until September 9, 2024. As a result, it does not appear that the parties can accomplish anything prior to next week’s scheduled conference. However, my understanding is that the New York State case is marked as a final adjournment. Thus, a court date in the VOSR proceeding a short interval after September 9, 2024, would be more efficient in reaching a resolution of the VOSR.

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Hon. Naomi Reice Buchwald  
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Southern District of New York  
July 23, 2024  
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Accordingly, it is respectfully requested the the July 30, 2024, VOSR hearing be adjourned until after September 9, 2024.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joshua L. Dratel", written in a cursive style.

Joshua L. Dratel

JLD/